IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

UNITED STATES OF AMERICA,) No. 08-04045-01-CR-C-NKL
)
Plaintiff,)
) 18 U.S.C. § 1344
V •) NMT 30 years and/or \$1 million
) Supervised Release: NMT 5 years
WENDY ELAINE BENTZEN,)
[DOB: 7/23/67])
) \$100 mandatory
Defendant.) penalty assessment

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material:

- 1. WENDY ELAINE BENTZEN, Defendant, was employed as the Information/Financial Manager for the American Federation of State, County and Municipal Employees (AFSCME) State Council 72 in Jefferson City, Cole County, Missouri.
- 2. American Federation of State, County and Municipal Employees (AFSCME) State Council 72 was the parent organization of approximately 25 locals in the states of Missouri and Kansas, with membership which worked for various state agencies and municipalities. AFSCME conducted business in Cole County, Missouri, and elsewhere.
- 3. Exchange National Bank was a financial institution, the accounts of which were insured by the Federal Deposit Insurance Corporation (FDIC).

The Scheme and Artifice to Defraud

- 4. From an unknown date, but at least as early as in or about March 2004, WENDY ELAINE BENTZEN, Defendant, devised and executed a scheme and artifice to defraud Exchange National Bank, an FDIC insured financial institution.
- 5. It was an object of the scheme and artifice to defraud that BENTZEN would unlawfully take and obtain, by deception and fraud, money entrusted to Exchange National Bank, and use the funds for her own benefit.
- 6. It was a part of the scheme and artifice to defraud that BENTSEN would forge the signature of the required co-signer on checks made payable to herself, written on AFSCME's general operating fund checking account, which had been neither approved nor authorized.
- 7. It was a further part of the scheme and artifice to defraud that BENTSEN would present these fraudulent checks to Exchange National Bank for payment, representing the forged cosigner's signature to be genuine and valid.

Bank Fraud

8. From an unknown date, but at least as early as in or about March 2004, and continuing to on or about February 12, 2007, and more specifically on or about the dates set forth below, in Jefferson City, in Cole County, in the Western District of Missouri, WENDY ELAINE BENTZEN, Defendant, knowingly executed the

above described scheme and artifice to defraud Exchange National Bank, an FDIC insured financial institution.

9. In support of the scheme and artifice to defraud, WENDY ELAINE BENTZEN, Defendant, committed or caused to be committed the following acts, among others, in execution of the scheme:

On or about February 12, 2007, in Jefferson City, in Cole County, in the Western District of Missouri, WENDY ELAINE BENTZEN, Defendant, knowingly executed a scheme and artifice to defraud Exchange National Bank, an FDIC insured financial institution, and to obtain monies, funds and assets owned by and under the care, custody and control of Exchange National Bank by means of false and fraudulent pretenses, representations and promises, and in support of the scheme and artifice to defraud, presented for payment to Exchange National Bank check #6051 made payable to the Defendant in the amount of \$500.00, bearing the Defendant's signature purportedly bearing the signature of Janice Meldrum when, in fact, the co-signer's signature had been forged by the Defendant, in violation of Title 18, United States Code, Section 1344(1).

> John F. Wood United States Attorney

By /S/

Jim Lynn

Assistant United States Attorney Missouri Bar No. 32140